

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

ANTHONY SMITH)
)
 Plaintiff,)
)
 v.)
)
 CENTRA HEALTH, INC.) CASE NO.: 6:23CV00030
)
 and)
)
 WESLEY THOMAS GILLESPIE)
)
 and)
)
 CHRISTOPHER PAUL JONES)
)
 Defendants.)

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW the Plaintiff, by counsel, and by agreement of Counsel, and moves the Court for a Continuance of the jury trial date of the above captioned matter from September 24-27, 2024 to January 28-31, 2025, and to adjust the deadlines set in this Court's Pretrial Order (Dkt. 15) and the Amended Scheduling Order (Dkt. 25) including the discovery and dispositive motions deadlines, based on the new trial dates that are January 28-31, 2025. In support thereof, the Parties state as follows:

1. This matter is currently set for a jury trial on September 24-27, 2024
2. The Court referred this matter for mediation, which has been set before the Honorable Judge C. Kailani Memmer on July 9, 2024 at 10:00 a.m. in the U.S. District Court for the City of Roanoke.

3. Counsel for the parties have since conferred and agree that should mediation be unsuccessful, that two months is insufficient time to complete discovery, conduct depositions, engage experts, and prepare for trial.
4. Counsel for Plaintiff requested the Court's availability for a four-day jury trial, which the Court provided to Counsel for the parties on April 10, 2024.
5. Counsel for the parties have conferred and agree that January 28-31, 2025 are the dates that are the most convenient for their schedules, and the Court has confirmed that those dates would be held pending the filing of a joint motion to continue the trial date and entry of an order granting the same.
6. A proposed order granting this motion is attached hereto as Exhibit 1.

Therefore, in order to provide the parties ample time to complete discovery, conduct depositions, engage experts, and prepare for trial should mediation be unsuccessful, the parties respectfully request that the Court continue the jury trial from September 24-27, 2024 to January 28-31, 2025 and adjust the deadlines set in this Court's Pretrial Order (Dkt. 15) and the Amended Scheduling Order (Dkt. 25) including the discovery and dispositive motions deadlines, based on the new trial dates that are January 28-31, 2025.

Respectfully Submitted,
ANTHONY SMITH
By Counsel

JAMES RIVER LEGAL ASSOCIATES
7601 Timberlake Road
Lynchburg, Virginia 24502
P (434) 845-4529
F (434) 845-8536

By: /s/ M. Paul Valois
M. Paul Valois, Esquire
Counsel for Plaintiff
Virginia State Bar No. 72326
mvalois@vbclegal.com

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of April, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such to all counsel of record.

/s/ M. Paul Valois, Esq.
M. Paul Valois
Counsel for Plaintiff
Virginia State Bar No. 72326
mvalois@vbclegal.com